## UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS LAREDO DIVISION

LA UNIÓN DEL PUEBLO ENTERO, et al.,	§	
Plaintiff,	§	
	§	Civil Action
v.	§	
	§	No. 5:21-cv-00071-MGM/JAK
FEDERAL EMERGENCY MANAGEMENT	§	
AGENCY and U.S. DEPARTMENT OF	§	
HOMELAND SECURITY,	§	
Defendants.	§	

## [PROPOSED] ORDER

The Court has considered Plaintiff's Motion for Discovery, CM/ECF Doc. 42, and any response supplied by Defendants, and the Court hereby GRANTS the motion as follows:

- (a) within fourteen days after the Court enters its order on this motion, FEMA must—
  - (i) file an amended answer admitting or denying every fact alleged in LUPE's Complaint, Doc. 1;
  - (ii) make the initial disclosures required by Rule 26(a)(1); and
  - (iii) file a declaration stating all qualifications or changes that FEMA claims to have made in IHP administration subsequent to its sworn statements in the deposition transcript filed with Plaintiff's motion; and
- (b) within fourteen days after FEMA produces all documents in the preceding paragraph, counsel for all parties must—
  - (i) confer in good faith to list each fact that remains genuinely disputed; and

(ii) file with the Court their list of disputed facts with the parties' joint or separate statements stating the reasons supporting the precise discovery means that the parties deem appropriate for creating the record necessary for the Court to resolve each fact dispute, which may include any discovery device permitted by the federal rules, expert testimony, *in camera* inspection of unredacted records, or appointment of a special master to conduct the *in camera* inspection.

The Court will en	nter further or	ders upon the parties	'compliance with this Order.	
SO ORDERED	ГНІЅ	day of	, 2022.	

HON. MARINA GARCIA MARMOLEJO UNITED STATES DISTRICT JUDGE